

**Attachment A**  
**Plaintiffs' Responses to Defendants' Objections**  
**Eric Cherveney (ABC/ABDC) 11/9/2018 Deposition Designations**

Mr. Cherveney's employment at ABC/ABDC dates back to 1996, predating the 2001 merger between AmeriSource Health and Bergen Brunswig. *See* 11/9/2018 E. Cherveney deposition ("Dep.") at 25:18-23. Prior to the merger, Mr. Cherveney was employed at Bergen Brunswig. *See* Dep. at 25:24-26:6. For the first few years, he was responsible for "subpoenas, information requests from state and federal agencies, as well as licensing", including DEA registrations for all the distribution centers ("DCs"). *See* Dep. at 58:22-59:7, 65:16-66:18.

From approximately 2002-2015, he was the supervisor of regulatory compliance for the East Region of the U.S., responsible for all regulatory and security requirements for DCs, including conducting audits of DCs. *See* Dep. at 61:17-24, 70:9-23, 72:3-10, 84:19-85:2. This work included ensuring that "proper training was conducted" and "the procedures were being followed with regards to shipment and receiving of controlled substances and prescription drugs, and similar requirements". *See* Dep. at 76:21-77:3. His job responsibilities required him to have a thorough understanding of the regulatory requirements for DCs. *See* Dep. at 86:1-10. Performing due diligence investigations "was assigned to me as a collateral duty in addition to my audit responsibilities and my responsibilities for my region." *See* Dep. at 249:24-250:2.

In 2015, Mr. Cherveney became director of diversion control, running ABC's entire Diversion Control Program on a day-to-day basis (included having investigators and analysts report to him and running the order monitoring program and the due diligence collection) and reporting up to David May. *See* Dep. at 141:15-22, 190:7-192:2.

Mr. Cherveney worked with Chris Zimmerman, ABC/ABDC Senior Vice President of Corporate Security and Regulatory Affairs ("CSRA"), throughout his entire career at ABC/ABDC. *See* Dep. at 180:5-11.